



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 11, 2020

Submitted Under Seal

Via E-mail

The Honorable Debra Freeman
United States Magistrate Judge
Southern District of New York
New York, New York 10007

**Re: United States v. Alejandro Javier Marin,
No. 20 Mag. 9491**

Dear Judge Freeman:

On November 10, 2020, Alejandro Javier Marin was presented on Complaint 20 Mag. 9491 and ordered detained following argument by the parties. Following the proceedings, defense counsel requested sealing of the case and transcript, and the Government noted its objection. Your Honor's Chambers directed that the parties confer and, if possible, submit a joint letter on the issue of sealing.

The parties have requested an expedited transcript and are conferring regarding whether sealing or any redactions to the transcript are appropriate. In particular, defense counsel indicated that [REDACTED] and defense counsel is collecting additional information on that issue. The parties will provide a further update to the Court on November 13, 2020, regarding any such proposed redactions or sealing of the transcript.

In the interim, however, the parties agree that the docket for this case should be unsealed, along with the Complaint and the minute entry from yesterday's proceeding. The Complaint was already unsealed in the Southern District of Miami when the defendant was presented there upon his initial arrest.

Because this case relates to an indicted case before the Honorable Alvin K. Hellerstein (19 Cr. 144 (AKH)), the Government is submitting a copy of this letter to Judge Hellerstein. The Government is also providing a copy of this letter, on an attorneys' eyes only basis, to counsel for two defendants in that case, consistent with Judge Hellerstein's prior rulings on sealed filings relating to Marin.

Given this letter's reference to [REDACTED] the parties respectfully submit this letter under seal, pending any further determination by the Court regarding the propriety of sealing or redactions in this matter.

Respectfully submitted,

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CC: Hon. Alvin K. Hellerstein
Christine Chung, Esq. (attorney's eyes only)
Sabrina Shroff, Esq. (attorney's eyes only)